

EXHIBIT “A”

BOSWORTH LAW

By: THOMAS E. BOSWORTH, ESQ.
Attorney I.D. No. 323350
123 South Broad Street, Suite 2040
Philadelphia, PA 19109
(267) 212-4177
tom@tombosworthlaw.com

TANYA MCCARTNEY and MARK
MONTGOMERY, Individually and
as Administrators of the ESTATE OF
KAIDON A. MONTGOMERY,

Plaintiffs,

v.

KIDS 2, INC. f/k/a KIDS II, INC.; and
KIDS 2, INC. d/b/a, t/a, a/k/a
INGENNUITY

Defendant.

CIVIL ACTION NO.: 3:21-CV-166

JURY TRIAL DEMANDED

**THOMAS E. BOSWORTH, ESQ.'S REPLY BRIEF TO DEFENDANT'S REPLY BRIEF
IN SUPPORT OF DEFENDANT'S MOTION FOR SANCTIONS**

I know that writing this brief probably is not even in my best interests, but, after much self-reflection, I know that it is what I must do. The way that I spoke to defense counsel in the at-issue depositions was rude and unacceptable. I am especially ashamed of the personal insults that I unfairly levied against Ms. Bassin. While tensions may run high during depositions and strong disagreements may arise, the manner in which I chose to address these disagreements was wrong. I allowed my strong desire to zealously represent the parents of a dead child to override my judgment in how to respectfully address opposing counsel.

Respectfully submitted,

/s/ Thomas E. Bosworth
THOMAS E. BOSWORTH, ESQ.